

WITHHOLDING TAX SURVEY

In France, the withholding of the tax at the source has been voted 22 december of 2016.

The text from tax authorities with most explanations must be published for an application in 2018. The aim is to levy the income tax directly at the source and to replace the payment of the tax a year after the income year.

To have an overview of the national tax systems, France propose to compare the different legislations.

	Germany	Denmark	The Netherlands	Belgium	France
			1. Income tax		
What types of income are concerned by the withholding tax? Please list all the incomes concerned.	 payroll tax (salaries) for ex value is 1 % of the value of a car(§ 38 EStG) income upon investments § 43 EStG pensions from public services capital gains tax 	 salary,(company car, employer-paid phone, employer-paid board and lodging) pension payments, unemployment benefits, sickness benefits, Dividends 	 Salaries, Allowance , Dividend Pension payments unemployment benefits sickness benefits , 	 Employee wages Board member fees (unless they are independent) Managers of a corporate Dividends, interest income Pension payments unemployment benefits 	 salary,(company car, employer-paid phone, employer-paid board and lodging) pension payments, unemployment benefits, sickness benefits,
Comparison	In Denmark some p	salaries, allowance are concer part of salaries are free of with cerned by the withholding tax	holding tax.	nce because there is alread	y a prepayment

What kinds of incomes are not concerned by the withholding tax?	- income of self employed - corporate income tax - income tax from rent and lease - statutory pensions but advance payments	 Income of self-employed (but advanced payment) Corporate tax (but advance payments) Capital gains on shares and investment funds Interest from deposit accounts Profits calculated on the sale of real property etc. Free accommodation for employee 	 Profit result from other work, capital gain on shares, profit on capital profits of your own company 	 Self employed Corporate income Rent of real estate Capital gains (shares) 	 income of self employed (but advance payments) corporate income tax (but advance payments) income tax from rent and lease capital gain on shares, profit on capital Profits calculated on the sale of real property etc.
In all countries, the incomes of self-employed are not concerned by the withholding tax. In Denmark (you have to ask for a permission to change the advance registration), Belgium (option Netherlands (compulsory) and in France (compulsory), there is a provisional tax (or advanced paraself-employed. In Denmark and in the Netherlands, no withholding tax on interest In all countries, profit on capital gain are not concerned (capital gain on shares, profit on capital).					porate income tax and in income of

Are there tax reductions on the income tax?	,	Yes	Yes	Yes, based on family structure (for example kids still depending on parents), pensions,	Yes, based on family structure (for example kids still depending on parents), pensions, and according to specific spending
Comparison	In all countries, there are the income.	tax reductions on the income	tax in consideration of age, f	family situation or in consid	eration of the origin/amount of

Are the tax reductions on the income tax rate included in the withholding tax?	It depends on the tax reduction. Tax exemptions are included, the rest isn't.	If the taxpayer has indicated the deductions in his or hers preliminary income, they are included in the withholding tax. The preliminary income is calculated in November the year before the tax year and the taxpayer can change it, if it is not	Yes	The list is long. Most deductions do not influence the withholding taxes but are received by completing the yearly tax return	The list is long. None deductions influence the withholding taxes but are received by completing the yearly tax return
Comparison		ept in France, there are tax retherlands and in Belgium, som			_
Is it possible to give an exhaustive list of the tax reductions concerned and not concerned by the withholding tax?	Yes, see appendix	Yes see appendix for the employees	Yes, see appendix	Most deductions do not influence the withholding taxes	There is none

For the tax reductions that are not included in the withholding tax, how the taxpayer receive the tax reductions?	reductions through ar	If the taxpayer has indicated the deductions in his or hers preliminary income, they are included in the withholding tax. The preliminary income is calculated in November the year before the tax year and the taxpayer can change it, if it is not correct — it is also possible to change it during the tax year. The goal is that you pay the correct tax during the year, the principle is called 'tax in balance'.	The tax payer receives the reductions through an annual wage-tax adjustment.	influence the	
Comparison	•	ium, in France and in The Nether reductions are including in the v	· · · · · · · · · · · · · · · · · · ·		e tax return. on given by the employee to tax
Could you please detail the different rates and tax schedules?	Yes, see appendix	Yes, see appendix	Yes, see appendix	Income taxes (personal income taxes) have tax rates from 25% - 50%.	From 0 to 45 % 0/14/30/41/45
Comparison	The rates vary from	0% to 56%.			

			2. Tax Payer		
Family situation, who pay the income tax: each member (spouses and children) of the family or is there a global taxation?	There is a joint assessment of married couples, and an individual assessment for everyone else	Each spouse is considered as individual taxpayer. The children are also seen as an individual tax payer. There is a possibility to transfer an unused personal allowance and deficits between the spouses.	Each member pay his own income tax. There is an exemption for children below the age of eighteen for the profit on capital. It's possible to transfer paying interest for the house and profit of capital gains between spouses.	Normally there is global taxation. Children have to do their own declaration when they have incomes (holiday work).	There is a joint assessment of married couples, and an individual assessment for everyone else
Comparison	In Germany, in Franc couples (with option	e and in Belgium, the matrim in Germany). rimonial situation gives the p	ndividual taxpayer except in Be nonial situation is taking into ac possibility to transfer an unused	count indeed there is a jo	int assessment of married

Are there specifications for the people when the have children?	reductions for children: - tax exemption 3624 €/child/parent/ye ar		No The income related combination tax discount is related to a working single with a child younger than 12 years or working partners with a child younger than 12 years and it apply for the partner with the lowest income.		YES Tax deductions for children are granted when they are depending on the parents. There is also a limited tax deduction for child day care.
Comparisor	In Germany, in Fra	nce and in Belgium, there are	specific rules or tax reduction	ns for children.	

	3. Fiscal calendar									
period for : • The incodeclaratio	Has adviser) 31.7 Businesses (with tax adviser 28.2 of the second following		is compulsory, but there can be an exemption for withholding income	income tax declaration should be done before the end of June of the	are compulsory The period for the income declaration is a civil year					

Com	par	riso	n		But, there is an exception in In Belgium, a proposition call In all countries, the Fiscal years In Germany, for agriculture In consideration of the active For winery: 1st of Septemb For forestry: 1st of October	countries, the declaration is compulsory. There is an exception in the Netherlands, concerning withholding income for people who have no other income. There is an exception in the Netherlands, concerning withholding income for people who have no other income. There is an exception in the Netherlands, concerning withholding income for people who have no other income. There is an exception in the Netherlands, concerning withholding income for people who have no other income. There is an exception in the Netherlands, concerning withholding income for people who have no other income. There is an exception in the Netherlands, concerning withholding income for people who have no other income. The Netherlands of Pensions There is an exception in the Netherlands, concerning withholding income for people who have no other income. The Netherlands of Pensions There is an exception in the Netherlands, concerning withholding income for people who have no other income. The Netherlands of Pensions There is an exception in the Netherlands, concerning withholding income for people who have no other income. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions. There is an exception in the Netherlands or pensions.				
Wha peri	od f	The	e pay The	r fiscal ment ? advance ment	Advance payment: quarterly	The advanced payment: Employee: every month with a salary Self-employed: 10 months every year	of salaries the company	it depends on the amount of salaries	The advanced payment: Employee: every month with a salary Self-employed income tax from rent: monthly or quarterly	
		0	The adju	ustment	Adjustment 1-3 months after the declaration	January until the 1. of July in the year after the fiscal year. A dayto-day interest is added	declaration must be done before 1 ST may.	depends when you	Adjustment 3 months after the declaration, payment has to be done between September and December.	

Comparison	 For The advance payment Each country have is own rules: every month to quarterly. The adjustment For all countries, the payment of the adjustment is realized after the tax declaration. 								
How the changing situations (birth, wedding, a loss of income) are treated during the fiscal period?	Information about income tax classes or income tax features (e.g. birth of a child) are automatically reported from the tax authorities to employers with electronic data exchange.	The employee is responsible for the information about his personal situation and the changing of this situation. In some cases he must give this information to the employer and in some cases he can fill it up in the income declaration Depends on the change: - Wedding: only has effect the next year Birth: immediately the child is considered as dependent	The employee is responsible for the information about his personal situation and the changing of this situation. he must give this information to the tax authorities, then information about income tax classes or income tax features (e.g. birth of a child) are automatically reported from the tax authorities to employers with electronic data exchange.						
Comparison	The changing of situations is not a problem: automati The tax payer has (the employee) got the responsibili	cally reported. But it supposed that the tax authority t	o be informed.						

		4. Transfer of data and rec	overy of income tax		
Who gives the withholding rate employee to the employer: the employee or the tax authorities? What is the deadline?	given through an automatic data exchange between the tax authorities and the employer. Changes/modifications are	exchange between the tax authorities and the employer. Changes/modifications are transferred automatically after notification. (monthly recognized)	employee must give his	finance gives the rates.	The withholding tax rate is given through an automatic data exchange between the tax authorities and the employer. Changes/modifications are transferred
Comparison	Changes/modifications are t	ling tax rate is given through an a ransferred automatically after no matic transfer. There is a calculati	tification. (Monthly reco	gnized).	

What are the information communicated to the employer and when?	The information (tax rate and other information) is communicated through automatic data exchange and in case of change anytime around the year-changes take effect for the tax payer from the 1 st of next month.	The information (tax rate and other information) is communicated through automatic data exchange and in case of change anytime around the year- changes take effect for the tax payer from the 1 st of next month.	in the case he started to work with employees and also	about age, marital status and dependent children. No automatically transfer data.	The information (tax rate and other information) is communicated through automatic data exchange and in case of change anytime around the year- changes take effect for the tax payer from the 1 st of next month and the year.
Comparison	in case of change anytime around in In Belgium, the employee in	ium, the information (tax rate and the year- changes take effect for t forms the employer about his per tion is refreshed every year by the	he tax payer from the 1 ^s	_	automatic data exchange and

Is it possible for an employee not to give his personal data to his employer?	Not possible (black labour, illegal employment)	No, then the employer must withhold at least 55 percent tax in the persons personal registration number.	No, the employee is obliged to give the information/data to the employer		The communication of the personal registration social number is compulsory (black labour, illegal employment) The employee cannot give directly his personal tax rate to the employer. The choice of the tax rate has to be asked to the tax Authorities The employee can refuse that
Comparison	In France no sanction if the	sible for an employee not to give employee doesn't want that the al rate) is applied according to the	tax administration communic	· ·	· .

What are the	Black labour, illegal	You are not allowed to employ a	The sanction for the	Sanctions :	You are not allowed to
	, ,	person without a Social Security			employ a person
		i ·	• •		
amployer in case of :	of tax, punishment by tax	number	calculate the withholding		without a Social Security
• No	authorities/ criminal courts			Fine of 50 euro –	number Black labour,
communication		The fine will be set at 25	anonymous person. This		illegal employment-
of the		percent of the non-withheld A-	is the highest rate for tax	missing declarations	defraudation of tax,
registration		taxes or it can be set at the full	without any reduction.		
number from		amount. In less serious cases,			
the employee?		the authorities may provide a			
		fine of 135 euros or a warning			
 Non repayment 					
of the			No renaument of		Punishment by tax
withholding			No repayment of		·
tax?			withholding tax for an		authorities and penalty
			anonymous person		sanctions
Comparison	Sanctions: Black labour, illeg	al employment, punishment by ta	ax authorities		
	In Netherland, no repaymen	t of withholding tax for an anony	mous person.		
	, , ,	,	·		

withholding rules for the business profits: • Who is the tax payer and who collects the income tax (tax or social authorities)?		personal owned and operated business, it is the person who runs the company, who is the taxed person. Income tax is collected by the tax authorities.	The employer is the tax- payer and the tax authorities are the collector for the tax and some of the social fee's The employer makes every month or in small company every quarter or year a calculation of the withholding tax and fill in a declaration. At that moment he pay the tax to the collector.	a voluntary based system of prepayments. If no prepayments are done, interests could be due. Prepayments must be done to the tax authorities.	Income tax is collected by tax authorities. If it is a limited company, the company is the tax person, there is no withholding tax but a sort of advanced prepayment tax If it is a personal owned and operated business, it is the person who runs the company, who is the taxed person.
Comparison	In all countries, the tax is col	lected by tax authorities.			
advanced payment? And how is it calculated? • Are there any	be paid quarterly and is calculated on the basis of the immediate past tax liability. The amount can be altered whenever needed. (with an explanation)	and December).	Normally there is no advance payment, but in a case it is possible to do an advance payment.	recommended to avoid interest. An advance payment can be paid quarterly.	Yes there is an advanced payment An advance payment has to be paid monthly or quarterly and is calculated on the basis of the immediate past tax liability. The amount can be altered whenever needed. (with an explanation)
Comparison	three countries, the amount	rance (monthly or quarterly), in D can be altered whenever needed ment is voluntary but recommen	d with explanation.	ear), an advance pay	ment has to be paid. In this

		T	T	T	T	
What are the	For investment income or	Banks have no obligation to	The tax payer for dividend		The collectors are banks and	
withholding rules for	interests the income tax of	withhold tax on payments of	tax is the limited (BV of	are deducted from	companies	
the capital gains	25% is collected for every	interest.	NV). The tax authorities	the dividend and	who pay the profits	
(dividends, interest,):	pay out by	There are no withholding rules	collect the tax.	paid to the tax	There are no withholding	
Who is the tax	banks/investment funds.	on capital gains etc.		authorities, and	rules on capital gains etc.	
payer and who collects the		There is only a withholding	It's more or less an	the dividend	There is only a withholding	
income tax (tax	No advance payments.	obligation for the payment of	advance payment. The tax		obligation for the payment of	
or social	advance payments.	dividends for persons and	is 15% of the profit.	the net dividend.	dividends and interests	
authorities,		companies that are not	13 13/0 Of the profit.	- Interests :	dividends and interests	
banks)?		· ·	The		lt in a firmal mate	
• Is there an		subsidiaries.	There are no other specific		It is a fixed rate	
advance			rules	Property income :		
payment? And				through tax		
how is it				declarations and		
calculated?				special real estate		
Are there any				taxes		
other specific						
rules?						
Comparison	In all countries there is no s	duance naument for the capital a	ains			
Companison	In all countries, there is no advance payment for the capital gains. In all countries, for the capital gains, there are withholding rules except in Denmark and in France.					
	In Germany and in The Netherland, the tax authority collect the tax ad there is a fix rate.					
	Concerning interests and div	vidends there is advanced payme	nt in all countries based on	a fixed rate		
In case of financial	Could only happen in case	Always the tax collector.	In case of financial	The company or	in case of an insolvency- tax	
difficulties of the tax	of an insolvency- tax debits		difficulties of the		debits must be fulfilled	
collector, who has to	must be fulfilled primarily.		employer there are no	responsible.	primarily. There are no	
pay the income tax?	, , ,		consequences for the	Personal liability	consequences for the income	
			income tax of the	of the company	tax of the employee.	
		<u> </u>		or the company	tax of the employee.	
Comparison	In all the countries, there is	no consequence on the employed	2.			
		·		-		

		5.	Feedback	
Is the withholding tax system efficient according to you? Is there any limits? Do you have any proposals so as to improve it?	Especially efficient for the state itself.	Yes	Yes, it makes easier for the tax authorities to collect the withholding tax from the employer than to collect the income tax from the employee. We called this in the Netherlands "the principle of least pain". There is no limit for the income with withholding tax. Give every taxpayer an identification card with all the information the employer	Not yet First application in 2018
Comparison		•	nprove the system : Give every taxpayer an id	dentification card with all the



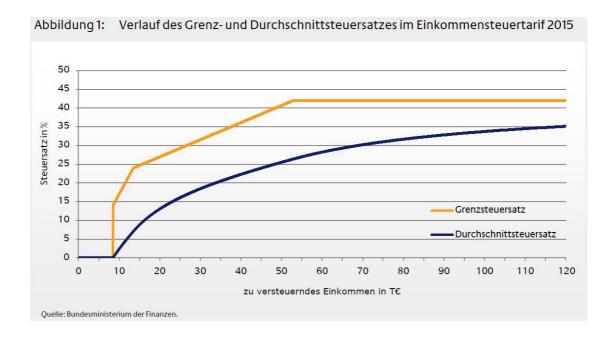
Germany

Tax reductions concerned by withholding tax:

- tax exemptions for income related expenses under 1000 €
- tax exemption for children § 32 EStG
- tax Exemption for single parent § 24b EStG
- proportional tax allowance for elderly retired persons § 24aEStG
- training tax allowance (e.g. for students)
- tax exemptions for agriculture 900 € until 30.700 €/year income)

Tax reductions non concerned by withholding tax:

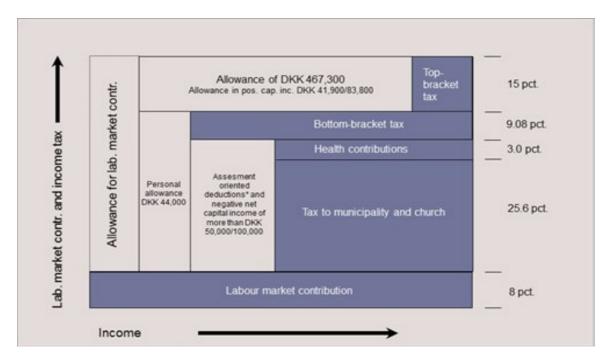
- Income related expenses expenses over 1000 € (e.g. commuting between home and work place, maintenance of two households, union contributions, work equipment).
- special expenses



Denmark

Tax reductions for employees:

- a general tax free allowance:
 - ♦ 5 906 euro in the income tax for persons over 18 years
 - sand 4.430 euro for persons below 18 years.
- A transport allowance:
 - 0-24 km: 0 cent
 25-120 km: 27 cent
 Over 120 km: 13.8 cent
- Deductions for payment on private pension:
 - Annuity pensions: 7.034 euro (min. 10 years payout)
 - \$\times\$ Life annuity pension: 6.470 euro (lifetime payout)
 - ♥ Deductions for interest expenses –
- An employment allowance 3.758 euro
- Donations to approved charitable associations 2.040 euro
- Deductions for subscriptions to unemployment insurance funds and unions
- Deductions for subscriptions to unions max. 805 euro
- Deduction for labor costs to help and repair of the house
 - ♦ 805 euro for services
 - saving actions in the home
- Deductions for child support 2.443 euro (normal)
- Alimony



Note. Based on the tax rate in an average municipality of 25.6% including church tax in 2016. Tax rates vary from 23.06% in the cheapest municipality up to 28.94% in the most expensive.

^{*} Including employment allowance of 8.3 pct. with a maximum of DKK 28,000

The Netherlands

List of tax reductions concerned by the withholding tax

- General taxdiscount:

People till the retirement age have a right of a maximum tax discount from € 2.242 for an income up to € 19.992.

For an income above € 19.992 is the taxdiscount reduced with 4,822% per euro.

If the income is \le 66.417 or more the general tax discount will be \le 0.

Retired people have a right of a maximum discount from € 1.145 for an income up to € 19.992.

For an income above € 19.992 is the taxdiscount reduced with 2,460% per euro.

If the income is \in 66.417 or more the general tax discount will be \in 0.

Employed taxdiscount:

Working people have a right of a maximum tax discount from € 3.103.

It starts with a tax discount from 1,793% for the first € 9.147 of salary.

For the salary from € 9.147 till € 34.015 the tax discount is 27,89% until the maximum of € 3.103.

So the maximum will be reached at a salary of € 19.684.

Above a salary of € 34.015 the tax discount will be reduced with 4% of de incom minus € 34.015.

So when the employee has a salary more then \in 111.590, the employed tax discount will be \in 0

Workbonus:

Working people of an age of 62 or 63 at de first of january 2016 and a salary above € 17.327 have a right of a workbonus until the maximum of € 1.119. The workbonus is 58,100% x income minus € 17.327. When the income is above € 23.104 then the workbonus will be reduced with 10,567% x (income minus € 23.104). So the wokbonus will be € 0 at the income of € 33.694

- Eldery tax discount:

Retired people have a right to an eldery tax discount from € 1.012 until an income of € 35.770,-. Is the income more then € 35.770 the eldery tax discount will be € 142.

- Single eldery tax discount:

Retired people have a right to an single eldery tax discount from € 433 when the live as a single

- Young disabled tax discount:

Young disabled people who have an income or other payment have a right to an young disabled tax discount. This tax discount can start at the age of 18 en stops at the age of retirement and apply for young people who are disabled at the age of 17 so they can't have a full time job. For disabled people who are studying and they are disabled before the age of 30.

- Lifecycle leave tax discount:

This tax discount is already stop in 2011. Only the people who have a reservation for lifecycle leave get a tax discount from € 209 for each year they have make this reservation of there income.

List of tax reductions not concerned by the withholding tax

- Income related combination tax discount

The income related combnation tax discount is related to a working singel with a child younger then 12 years or working partners with a child younger then 12 years and it apply for the partner with the lowest income.

The working income must be € 4.881 or more. If the working income is € 4.881 and lesser then € 32.969 the tax discount is € 1.039 + 6,159% x (workingincome minus € 4.881) until a maximum from 32.969. Above this working income the tax discount wil be € 2.769.

For retired people the tax discount is € 531 + 3.143%% x (workingincome minus € 4.881) until a maximum from 32.969. Above this working income the tax discount wil be € 1.413.

Most of the tax reductions appointed by the withholding tax are also apply for every tax payer of income tax

France:

Income Tax: deduction, reduction, tax credit

Family tax help:

> Deduction:

- Maintenance for spouse or ex-spouse
- Child support
- Forebears support

> Tax credit:

- School fees
- Childcare fees (out of home)
- Employment of an at-home salaried

Gifts, contributions and subscriptions tax help:

Deduction

- Gift to community services
- Gift to political party
- Union contributions
- Retirement contributions
- SOFICA's capital subscription

> Tax credit:

Dependent people tax help:

- Reception fees for old people
- Reception fees for dependent people
- Contracts bonus for « surviving income » and « Disable saving »

Housing tax help:

- Fees connected to main house energy quality
- Loan interests for main house purchase
- Equipment fees connected to people assistance
- Rental investments (Duflot/Pinel)
- « Affordable rent » package

Professional Reductions and tax credits:

- Financial year tax credits and reductions (2069-RCI)
- Research tax credit (2069-A)
- Audiovisual and cinema tax credit (2069-CI, 2079-AV et 2079-CINT)
- Corsica investment tax credit (2069-D)
- Family tax credit (2069-FA)
- Learning tax credit (2079-A)
- Profit-sharing tax credit (2079-AI)
- Art profession tax credit (2079-ART)
- Employment and competitiveness tax credit (2079-CICE)
- Overseas departments investments tax credit (2079-CIOP et 2079-CIOL)
- Phonographic work production tax credit (2079-DIS)
- Managers training tax credit (2079-FCE)
- Restaurant owner-chef tax credit (2079-MR)
- Market research tax credit (2079-P)
- Tax credit for employees purchasing a company (2079-RS)
- Live performance production tax credit (2079-SV)
- Video games tax credit (2079-VIDEO)
- Sponsorship tax credit (2069-M)
- Bicycle corporation tax tax credit (2079-VLO)